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August 6, 2024

MEMO ENDORSED  
8/13/24

VIA ECF

Honorable Colleen MacMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Defendant can travel as  
requested herein.

*Colleen MacMahon*

Re: United States v. Joseph Bailey  
19 Cr. 412 (CM)

Dear Judge MacMahon:

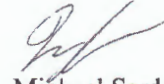
We represent the defendant, Joseph Bailey, in the above-referenced matter. We are writing to request the Court's permission for Mr. Bailey to travel to Italy between September 1, 2024 and September 12, 2024. Mr. Bailey has requested permission from his probation officer, Officer Kristen K. Maharaj, on June 26, July 1, and July 29 of 2024 but has not yet received a response. We are advised by Assistant United States Attorney Dina McLeod that the government has no objection to this request.

Mr. Bailey pleaded guilty to one count of violating 18 USC 1349 (conspiracy to commit wire fraud) on January 15, 2020. Mr. Bailey was sentenced by the Court on December 22, 2020 to a term of imprisonment of six months, followed by a term of supervised release of three years. Mr. Bailey surrendered to the custody of the Bureau of Prisons ("BOP") on October 7, 2021 to serve his sentence. Mr. Bailey has since been released from BOP custody and is on supervised release. Mr. Bailey has complied with all of the terms of his supervised release. In addition, Mr. Bailey has fully satisfied the restitution and forfeiture obligations arising from this case. Finally, during the period of his pre-trial release Mr. Bailey complied with all terms imposed by pre-trial services.

Mr. Bailey seeks permission to travel to Italy in a trip with his wife. Mr. Bailey will be accompanied on the entire trip by his wife.

We respectfully request that the Court allow the requested travel.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Sardar', written in a cursive style.

Michael Sardar

cc: AUSA Dina McLeod (by ECF)

Probation Officer Kristen K. Maharaj (Kristen\_maharaj@nyep.uscourts.gov)